

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

STEPHEN A. ZREND, JR., P.C.,
an Oklahoma professional corporation,

Plaintiff,

vs.

Case No. CIV-13-394-L

GO GREEN GLOBAL TECHNOLOGIES CORP.,
a Nevada corporation, a/k/a and/or d/b/a and/or
f/k/a Diversified Secure Ventures Corp; a/k/a and/or
d/b/a and/or f/k/a Secure Runway Systems Corp.,
a/k/a and/or d/b/a and/or f/k/a Runway Systems
Corp.,

Defendant.

COMPLAINT

COMES NOW the Plaintiff, Stephen A. Zrend, Jr., P.C., an Oklahoma Professional Corporation, and for its causes of action against the Defendant Go Green Global Technologies Corp. (a/k/a and/or d/b/a and/or f/k/a Diversified Secure Ventures Corp., a/k/a and/or d/b/a and/or f/k/a Secure Runway Systems Corp., a/k/a and/or d/b/a and/or f/k/a Runway Systems Corp.) (the “Defendant”), a Nevada corporation, alleges and states the following:

1. At all times relevant hereto, the attorneys of the Plaintiff were attorneys at law, licensed and in good standing with the Oklahoma Bar Association and by the Supreme Court of the State of Oklahoma, and were and are located in Oklahoma City, Oklahoma.

2. The Defendant is a Nevada corporation which has its principal executive offices located at 115 Hurley Road, Unit 1A, Oxford, CT 06478. The Plaintiff alleges actual damages in

excess of seventy-five thousand dollars (\$75,000.00), exclusive of costs and interest. This Court has jurisdiction and venue over these causes of action pursuant to Title 28 U.S.C. §1332 (Diversity of Citizenship).

3. Defendant requested Plaintiff's legal services and assistance in connection with the preparation of corporate acquisition and reorganization documents, and the preparation of private placement common stock offering documents for the offer and sale of common stock of the Company to be made in reliance upon Regulation D under the Securities Act of 1933, and other securities law and corporate law matters.

4. Plaintiff agreed to accept the representation of the Defendant with the understanding and agreement that Defendant would be responsible for the timely payment of Plaintiff's attorneys' fees and expenses related to its representation of the Defendant. Defendant has reaffirmed and ratified, verbally and in writing, all attorney fees and costs associated with Plaintiff's representation of all a/k/a and/or d/b/a and/or f/k/a names of Defendant as named herein.

6. In furtherance of its representation of Defendant, Plaintiff has incurred expenses and devoted significant time and effort to Defendant's legal matters pursuant to written and/or verbal contract.

7. Although requests for payment have been made by Plaintiff, Defendant has failed and refused to pay its obligation to the Plaintiff; and, by reason thereof, has breached its contract with the Plaintiff and has failed to pay its legal fees and related expenses and is in default under

the terms of its written and oral agreements for legal services with the Plaintiff. Defendant is also liable to the Plaintiff under any and/or all other theories available according to common law, including, but not being limited to, unjust enrichment quantum meruit and other theories of recovery.

8. As of this date, Defendant is indebted to Plaintiff in the total amount of \$81,375.75 for unpaid legal fees and expenses.

WHEREFORE, Plaintiff prays that it recover judgment against the Defendant in the amount of \$81,375.75, as well as any accrued or accruing interest thereon, attorneys fees and costs regarding this action, and that it have all other and further relief to which it may be entitled.

Respectfully submitted,

/s/ Mark A. Mathews

ATTORNEY LIEN CLAIMED

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/s/ J. Steven Coates

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